



**GEORGIA GOVERNMENT TRANSPARENCY &
CAMPAIGN FINANCE COMMISSION**

Memorandum

TO: David Emadi
Executive Secretary

FROM: Joe Cusack
Senior Staff Attorney

DATE: November 18, 2020

RE: RECOMMENDATION FOR ADMINISTRATIVE DISMISSAL
In the Matter of Jewel Scott
Case Number: 20-0026-C

On May 7, 2020 the Georgia Government Transparency and Campaign Finance Commission ("Commission") received a third-party complaint filed by John Carbo ("Complainant") alleging that Jewel Scott ("Respondent") had violated the Campaign Finance Act ("Act") by failing to file a December 31, 2019 Campaign Contribution Disclosure Report ("CCDR"), by failing to itemize and disclose \$14,550.00 in in-kind contributions, and by failing to disclose contributions that were listed on a two-day business report ("TDB").

Respondent was the successful candidate in the Clayton County Superior Court Judicial election which was held on June 9, 2020. Respondent filed her Declaration of Intention to Accept Campaign Contributions on September 9, 2020 and qualified to run for office on March 5, 2020.

Complainant alleged that Respondent failed to file her December 31, 2019 CCDR, however Respondent contacted the Commission and had a filing issue that caused her report, which was timely filed, to show as a "working report" and thus was not able to be accessed by the general public. Respondent contacted the Commission to rectify the issue and was able to file the proper CCDR. Although this CCDR was technically filed late, this was due to a system error that did not allow Respondent to file the CCDR. Commission Staff was able to determine that Respondent had logged into her account and tried to file this CCDR within the time period where a late fee would not be incurred.

The December 31, 2019 CCDR was the first CCDR that was due for Respondent's campaign. Due to the system error that barred Respondent from filing the CCDR, every expenditure and contribution to Respondent's campaign until that point could not be accessed by the public. After the Commission manually corrected this filing the expenditures and contributions could be accessed by the public.



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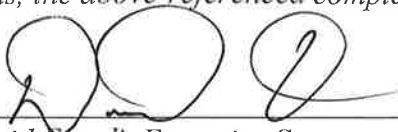
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Complainant also alleges that Respondent failed to itemize and disclose \$14,550.00 in in-kind contributions on her January 31, 2020 CCDR. The January 31, 2020 initial CCDR lists on the face sheet, \$14,550.00 in in-kind contributions and \$14,550.00 in monetary contributions to the campaign. Respondent explained this as a Scrivener's error which was obvious as it would be very rare that someone raised the same amount of money as they received in in-kind contributions. Respondent stated there had been no in-kind contributions to the campaign and thus none were reported in the CCDR.

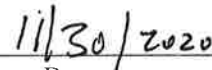
Complainant asserts that Respondent failed to disclose contributions that were listed on a TDB from April 23, 2020. These contributions that were disclosed on this TDB stemmed from the December 31, 2019 CCDR where Respondent had technical issues in filing and as such were disclosed on the CCDR once it was able to be filed, as such there was no hiding of these contributions.

Since no violations of the Act occurred, there is no basis to basis to proceed. Based upon the forgoing analysis, this complaint should be administratively dismissed pursuant to Ga. Comp. R. & Regs. 189-2-.03(5).

I, David Emadi Executive Secretary of the Georgia Government Transparency and Campaign Finance Commission, agree with the above analysis to administratively dismiss this complaint. Thus, the above-referenced complaint shall stand dismissed.



David Emadi, Executive Secretary



Date